

Payton, Richard

From: Payton, Richard
Sent: Wednesday, February 21, 2018 3:17 PM
To: 'Devore - CDPHE, Lisa'; Hou, James
Cc: Fallon, Gail
Subject: RE: Exceptional Events questions: Initial notification dialogue for Lamar April 5, 2016

Thanks Lisa. Don't know if you were on the WESTAR call today, but documenting initial notifications is a "room for improvement" situation for me.

Regarding Alamosa: there are no known or anticipated regulatory decisions using Alamosa PM10 data. EPA would recommend that CDPHE not develop demonstrations for Alamosa exceptional events; flags and initial descriptions in AQS would be our recommended extent of your effort. If you do develop EE demonstrations for Alamosa, Region 8 would not expect to prioritize those demonstrations for review.

For Lamar, the only anticipated "regulatory" use of the Lamar PM10 data would be to trigger maintenance plan contingency measures, should Lamar violate the NAAQS. At present Lamar is not violating the NAAQS. If there were no Dec. 2017 exceedances, then the 2015-2017 data attain the NAAQS, even without EPA action on the 8/22/2015 package you just submitted. At present we plan to hold that demo you without review. For April 5, 2016, we would not recommend a demonstration. If there were no 2017 exceedances, then the 2015-2017 data attain with just 1 exceedance (3 allowed, 4 violate), and 2016-2018 can only violate if there are more than 2 exceedances in 2018. So you could decide to work on April 5, 2016 later if 2018 is looking bad. That said, triggering contingency measures is not an EPA regulatory decision (we don't issue a Federal Register notice notifying of a violation). So I continue to ask OAQPS to include contingency triggers as a decision apt for an alternative path to full demonstration and review.

For ozone, by all means, give me the technical portions when ready and I can get to work on it.

Richard

From: Devore - CDPHE, Lisa [mailto:lisa.devore@state.co.us]
Sent: Wednesday, February 21, 2018 1:55 PM
To: Payton, Richard <Payton.Richard@epa.gov>; Hou, James <Hou.James@epa.gov>
Subject: Exceptional Events questions

Hi Richard (and James just in case),

Colorado has a few exceptional event related questions for EPA Region 8:

- *At our last internal meeting, we couldn't remember if EPA will review PM10 TSDs for Alamosa? We have a few exceedances in 2016 and want to determine if we should work on TSDs.
- *What is the status of Lamar concurrences? We just submitted the 8/22/2015 event, but wonder if we need to work on the 4/5/2016 event (which was regional and also occurred in Alamosa)
- *Last, would you rather see the technical portions of the 9/2017 ozone event(s) or the draft in it's entirety to begin review?

Please let me know if you have any questions and feel free to send to others if needed.

Thank you,
Lisa

Lisa Devore, M.S./P.E.
Emerging Air Quality Issues Supervisor
Planning and Policy Program



COLORADO
Air Pollution Control Division
Department of Public Health & Environment

P 303.692.3117 | F 303.782.5493
4300 Cherry Creek Drive South, Denver, CO 80246-1530
Lisa.Devore@state.co.us | www.colorado.gov/cdphe/apcd

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